

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Raven's Place, LLC, an Illinois Limited Liability Company, d/b/a "Raven's Place" and Raven's Place, LLC, an Illinois Limited Liability Company d/b/a The Vault Entertainment Group, Dushone Thomas, individually, and Raymond Thomas, individually,

Case No. 23-cv-00728

Judge Mary M. Rowland

Plaintiffs.

v.

The City of Blue Island, an Illinois Municipal Corporation, Fred Bilotto, in his individual capacity and as Mayor of the City of Blue Island.

Defendants.

PLAINTIFFS' MOTION FOR ENTRY OF DEFAULT

Pursuant to Fed. R. Civ. Pro. 55(a), Plaintiffs request that the clerk enter the default of Defendants The City of Blue Island, an Illinois Municipal Corporation and Fred Bilotto, in his individual capacity and as Mayor of the City of Blue island. In support thereof, Plaintiffs state as follows:

1. This case was originally filed in the Circuit Court of Cook County, Illinois on January 6, 2023.
2. On February 6, 2023, Defendants filed a Notice of Removal removing this matter to federal court seeking jurisdiction under 28 U.S.C. §§1331 and 1343.
3. Defendants did not file or serve an answer before removal.
4. On February 6, 2023, Defendants filed their appearances in this Court. (ECF No. 3 and 4).

5. Pursuant to this Court's Minute Order on March 9, 2023, Defendants were required to answer or otherwise plead by March 31, 2023. (ECF No. 12).

6. Defendants did not file or serve any pleadings by March 31, 2023.

7. Accordingly, Defendants are in default.

WHEREFORE, Plaintiffs respectfully request that the Clerk enter Defendants' default in this matter and set this matter for prove-up hearing on Defendants default.

Dated: April 7, 2023

/s/ John C. Ellis
One of Plaintiffs' Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2023, a copy of the foregoing was filed with the Court using the Clerk of Court's CM/ECF system, which by its operation will send notice of this filing to all counsel of record.

/s/ David DeSchepper
One of Plaintiffs' Attorneys